



625 State Street, PO Box 2207
Schenectady, NY 12301-2207
mvphhealthcare.com

August 2, 2024

Michael Barber
General Counsel
Green Mountain Care Board

Re: 2025 Vermont Exchange Rate Filing - Individual
SERFF Tracking #: MVPH-134081032
2025 Vermont Exchange Rate Filing – Small Group
SERFF Tracking #: MVPH-134081005

Dear Mr. Barber:

This letter is in response to your correspondence received 07/30/24 regarding the above-mentioned rate filings. The responses to your questions are provided below.

1. For MVP's 10 most common mental health CPT codes:

- a. Provide MVP's reimbursement for mental health visits in VT and bordering locations.*
- b. Provide a comparison of MVP's reimbursement to other payers' reimbursement in VT and bordering locations. Provide the source of the information used for the comparison.*

Response: MVP was granted an extension for this question and will respond by August 7.

2. It appears that MVP's quantification of the impacts of Act 111 focused solely on claims increases due to the elimination of savings from the programs described in Exhibits 8 and 9. Describe any administrative costs of these programs, including staff costs and any third-party vendors, that would be eliminated:

- a. Under Act 111 as originally enacted.*
- b. Under Act 111, as amended by Act 185.*

Response: MVP does not anticipate a material reduction in administrative expense because of these regulations since MVP still has these programs in place in other states in which we operate, as well as non-commercial lines of business in Vermont. MVP anticipates that under the first scenario, there would be a significant increase in administrative costs because existing systems, policies and procedures, contracts, and operations will need to be upgraded to perform these tasks on a state-by-state, and product-line basis. MVP has not yet evaluated the potential cost of the administrative lift under the first scenario, but we expect it will be significant, costly, and uniquely challenging for a small, regional, not-for-profit health plan like MVP to ever operationalize for such a small percentage of its overall business. The requirements delayed until January 1, 2026, under Act 185 are completely unique to Vermont, do not reflect industry best practices and standards, and subject commercial rate payers to higher out-of-pocket costs and premiums that MVP largely considers wasteful, inappropriate, and/or contrary to contractual agreements and payment policies with providers. MVP hopes that regulatory guidance and/or further statutory changes can establish more workable and realistic requirements, or fully repeals these delayed requirements.



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If you have any questions or require any additional information, please contact me at ebachner@mvphealthcare.com.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Bachner", is positioned below the word "Sincerely,".

Eric Bachner, ASA
Director, Commercial Market & Valuation Actuary
MVP Health Care, Inc.